

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

As representative of

THE COMMONWEALTH OF PUERTO  
RICO, *et. als.*

Debtors<sup>1</sup>

PROMESA Title III

No. 17 BK 3283 (LTS)

(Jointly Administered)

**NOTICE OF INTENT TO REPLY TO FOUR HUNDRED NINETY-SIXTH  
OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO  
RICO TO PARTIALLY SATISFIED AND PARTIALLY NO LIABILITY CLAIMS ON  
BEHALF OF FERNANDO COMULADA ORTIZ**

**TO THE HONORABLE COURT:**

COMES NOW, Fernando A. Comulada Ortiz (“Comulada”), through his undersigned counsel, and respectfully submits the instant notice as to the *Four Hundred Ninety-Sixth Omnibus Objection (Substantive) Of the Commonwealth of Puerto Rico to Partially Satisfied and Partially No Liability Claims (ECF No. 21749)* as follows:

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233 (LTS)) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. On May 24, 2018, Comulada filed his Claim No. 20873 against the Commonwealth of Puerto Rico (the “Commonwealth”) for \$38,000.00, premised on ten (10) lost portion of traditional lottery ticket no. 01180, Series B, Drawing 394 and twenty (20) lost portions of traditional ticket no. 28324, Series C, Drawing 394 (the “Claim”).

2. On August 5, 2022, the Commonwealth filed an objection to the Claim on the basis that it purports to assert liabilities associated with the Commonwealth but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth, such that the Debtors are unable to determine whether Comulada has a valid claim against the Commonwealth or any of the Title III debtors (the “Objection”).

3. At the time of the filing by the Financial Oversight and Management Board of the Commonwealth of Puerto Rico’s (the “Commonwealth”) of the Commonwealth’s Title III petition, Comulada was processing his claim through a complaint filed with the Court of First Instance of Puerto Rico, during which process documentary and testimonial evidence was offered in support of the Claim. However, as a result of the filing of the Title III petition the case was stayed prior to the entry of judgment.

4. Comulada is in the process of gathering the available evidence in support of the Claim for which he needs a period of fifteen (15) days.

**WHEREFORE**, Comulada requests a term of fifteen (15) days to reply to the Objection.

San Juan, Puerto Rico, this 18<sup>th</sup> day of August 2022

**s/CHARLES A. CUPRILL-HERNÁNDEZ**  
**USDC-PR 114312**

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